

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

FIRECLEAN LLC

Plaintiff,

V.

Case No. 1:16-cv-293 TSE/JFA

GEORGE FENNELL

and

STEEL SHIELD TECHNOLOGIES, INC.

Defendants.

**MOTION FOR LEAVE TO FILE VIDEO OF GEORGE FENNELL'S NOVEMBER 11,
2016, DEPOSITION WITH THE COURT AS AN EXHIBIT TO DEFENDANTS' BRIEF
TO BE FILED NOVEMBER 22, 2016, PER THE COURT'S ORDER**

COME NOW the Defendants, George Fennell and Steel Shield Technologies, Inc. (hereinafter “Defendants”), by and through counsel, Helen Neighbors and the law firm of Franklin & Prokopik, P.C., and file this motion for leave to file the video of Defendant George Fennell’s November 11, 2016 deposition, in order to provide the Court with an opportunity to independently evaluate the defendant, as an exhibit to Defendants’ brief, which will be filed November 22, 2016 per the Court’s order. In as much as both parties have made representations with respect to the deposition, in the interest of justice the Court should be afforded the opportunity to independently evaluate said deposition.

In support thereof, Defendants submit the attached Memorandum explaining the legal basis for their position.

WHEREFORE, Defendants move the Court to grant this motion.

Dated: November 22, 2016

Respectfully Submitted,

DEFENDANT GEORGE FENNELL
By Counsel

/s/ Helen D. Neighbors, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on 22nd day of November, 2016, Defendant George Fennell's Motion to File Document Under Seal was filed with the Clerk of the Court for the Eastern District of Virginia (Alexandria Division) using the CM/ECF system, which will then send a Notification of Electronic Filing (NEF) to the following counsel of record:

Bernard J. DiMuro, Esq.
Stacey Rose Harris, Esq.
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/s/ Helen D. Neighbors, Esq.

Helen D. Neighbors, Esq.